

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: NOV 19 2018

UNITED STATES OF AMERICA

: SEALED INDICTMENT

- v. -

: 18 Cr.

ARLICIA ROBINSON,

Defendant.

18 CRIM 836

COUNT ONE

The Grand Jury charges:

1. On or about July 25, 2018, in the Southern District of New York and elsewhere, ARLICIA ROBINSON, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A); and Title 18, United States Code, Section 2.)

COUNT TWO

The Grand Jury further charges:

3. On or about August 2, 2018, in the Southern

Judge Hellerstein

District of New York and elsewhere, ARLICIA ROBINSON, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A); and Title 18, United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

5. On or about August 16, 2018, in the Southern District of New York and elsewhere, ARLICIA ROBINSON, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A); and Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

7. As a result of committing the narcotics offenses alleged in Counts One, Two, and Three of this Indictment, ARLICIA ROBINSON, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

SUBSTITUTE ASSET PROVISION

8. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

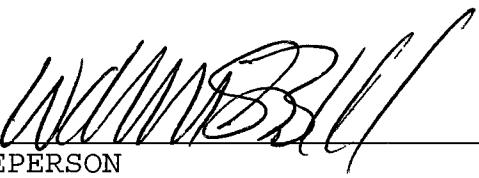
(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON



GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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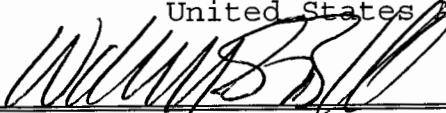
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(18 U.S.C. § 2, 21 U.S.C. §§ 812,
841(a)(1), and 841(b)(1)(A).)

GEOFFREY S. BERMAN

United States Attorney.



11/19/18 - Filed Sealed Indictment

ac d/w issued

